

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PETER WILSON, on behalf of himself and others similarly situated,

Plaintiff,

V.

DIALPAD, INC.

Non-Party Subpoena Recipient.

Misc. Case No. 2:25-mc-34

PETER WILSON, on behalf of himself and
others similarly situated,

Plaintiff

V.

TEXONA MARKETING LLC D/B/A
COLLINS GHOSTWRITING

Defendant.

Underlying Action Pending in the U.S.
Southern District of Texas

Case No. 4:24-CV-04003

**Plaintiff Peter Wilson's
Notice of Non-Opposition to Motion to Compel
Production of Documents Pursuant to Rule 45 Subpoena**

Plaintiff Peter Wilson respectfully notes that no objection or otherwise has been filed to the Plaintiff's Miscellaneous Case Motion to Compel. Third Party Dialpad, Inc. filed no response to the motion, despite being personally served on June 18, 2025 (ECF 2). Plaintiff therefore respectfully requests that the Court grant the Plaintiff's Motion to Compel as unopposed and award the costs of this proceeding as well as Plaintiff's attorneys' fees as against Dialpad, Inc., as contemplated by Rule 45(d)(1), with Plaintiff's counsel to submit a fee motion for the Court's consideration and approval within 30 days.

PLAINTIFF,
By his attorneys

Dated: July 16, 2025

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 16, 2025, the foregoing was served via electronic mail on counsel for the Defendant in the underlying action.

July 16, 2025

/s/ Andrew Roman Perrong
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